

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 01-455-A
)	
ZACARIAS MOUSSAOUI)	

**STANDBY COUNSEL'S MOTION FOR EXTENSION OF TIME TO FILE THEIR
REPLY TO THE GOVERNMENT'S RESPONSE TO INTERVENORS' MOTION FOR
ACCESS**

On April 23, 2003, the Court ordered that any reply to the United States' Response to the Intervenor's Motion for Access to Certain Portions of the Record be filed no later than May 1, 2003. In response to that order, Standby counsel prepared a reply that was forwarded to the Court Security Officer for classification review on April 30, 2003. See Order dated Oct. 3, 2002 (requiring that pleadings be presented to the Court Security Officer for classification review prior to filing).¹ Standby counsel are awaiting the results of that review, which they expect to be completed by no later than Monday, May 5, 2003. Accordingly, counsel request that they be permitted to file their reply out of time and by close of business Monday, May 5, 2003. For the Court's convenience, a proposed order is attached.

Respectfully submitted,

ZACARIAS MOUSSAOUI
By Standby Counsel

¹ The instant pleading has not be presented to the Court Security Officer for classification review. However, such a review will be requested before a copy of this pleading is forwarded to Mr. Moussaoui.

/S/

Frank W. Dunham, Jr.
Federal Public Defender
Gerald T. Zerk
Senior Assistant Federal Public Defender
Kenneth P. Troccoli
Anne M. Chapman
Assistant Federal Public Defenders
Eastern District of Virginia
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0800

/S/

Edward B. MacMahon, Jr.
107 East Washington Street
P.O. Box 903
Middleburg, Virginia 20117
(540) 687-3902

/S/

Alan Yamamoto
108 North Alfred Street
First Floor
Alexandria, Virginia 22314
(703) 684-4700

/S/

Judy Clarke
Federal Defenders of San Diego, Inc.
225 Broadway, Suite 900
San Diego, California 92101
(703) 600-0855; (619) 234-8467

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing pleading was served upon AUSA Robert A. Spencer, AUSA David Novak and AUSA Kenneth Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, VA 22314, by placing a copy BY HAND in the box designated for the United States Attorney's Office in the Clerk's Office of the U.S. District Court for the Eastern District of Virginia on this 2nd day of May 2003.

/S/

Kenneth P. Troccoli

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 01-455-A
)	
ZACARIAS MOUSSAOUI)	

ORDER

Upon consideration of standby counsel's Motion for Extension of Time to File Their Reply to the Government's Response to Intervenors' Motion for Access, and finding good cause therefor, it is hereby

ORDERED that said motion is Granted; and

FURTHER ORDERED that standby counsel may file their reply by close of business Monday, May 5, 2003.

Leonie M. Brinkema
United States District Judge
Alexandria, Virginia

Dated: _____